IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| J.Y.C.C., et al., | |
|--|-------------------------------------|
| Plaintiffs, |) |
| v. | No. 4:15-CV-1704-RWS (Consolidated) |
| Doe Run Resources Corporation, et al., | |
| Defendants. |) |

JOINT PROPOSED AGENDA FOR OCTOBER 28, 2022 STATUS CONFERENCE

COME NOW Plaintiffs and Defendants, by and through the undersigned counsel, and respectfully submit a joint proposed agenda for the October 28, 2022 Status Conference. The parties propose the following topics of discussion:

- I. Plaintiffs' Motion for Anti-Suit Injunction to Prevent Frustration of Court's Protective Order of March 24, 2022 (Dkt. No. 671);
- II. Defendants' Motion to Dismiss with Prejudice Those Initial Trial Pool Plaintiffs Who Did Not Comply with the Court-Ordered Verification Process (Dkt. No. 673); and
- III. Plaintiffs' Motion to Enforce Or Supplement This Court's Protective Order of March 24, 2022, to Enjoin Defendants from All Ex-Parte Contact with Plaintiffs (Dkt. No. 701).

Respectfully submitted, this 25th day of October, 2022.

RODRIGUEZ TRAMONT + NUÑEZ, P.A. KING & SPALDING LLP

By: /s/ Frank R. Rodriguez
Frank R. Rodriguez, #348988FL
Paulino A. Nuñez, #814806FL
255 Alhambra Cir., Suite 1150
Coral Gables, FL 33134
(305) 350-2300
frr@rtgn-law.com
pan@rtgn-law.com

NAPOLI SHKOLNIK PLLC

Hunter Shkolnik, #2031458NY Paul J. Napoli, #251314NY Patrick J. Lanciotti, #507523NY 360 Lexington Avenue 11th Floor New York, NY, 10017 (212) 397-1000 hunter@napolilaw.com pnapoli@napolilaw.com planciotti@napolilaw.com

THE GORI LAW FIRM

D. Todd Matthews, MO Bar 52502 156 N. Main St. Edwardsville, IL 62025 (618) 659-9833 todd@gorijulianlaw.com

Attorneys for Plaintiffs

By: /s/ Geoffrey M. Drake
Andrew T. Bayman (GA Bar No. 043342)
Carmen R. Toledo (GA Bar No. 714095)
Geoffrey M. Drake (GA Bar No. 229229)
Rania Kajan (GA Bar No. 924227)
1180 Peachtree Street, N.E., Suite 1600
Atlanta, Georgia 30309
(404) 572-3438
abayman@kslaw.com
ctoledo@kslaw.com
gdrake@kslaw.com
rkajan@kslaw.com

Tracie J. Renfroe (TX Bar No. 16777000) 1100 Louisiana Street, Suite 4000 Houston, Texas 77002 (713) 751-3209 trenfroe@kslaw.com

Attorneys for Defendants The Renco Group, Inc., D.R. Acquisition Corp., Renco Holdings, Inc., Ira L. Rennert, The Doe Run Resources Corporation, Theodore P. Fox, III, Marvin K. Kaiser, Jeffrey L. Zelms, Jerry Pyatt

LEWIS RICE LLC

Thomas P. Berra, Jr. (#43399MO) Michael J. Hickey (#47136MO) 600 Washington Ave., Suite 2500 St. Louis, MO 63102-2147 (314) 444-7600 tberra@lewisrice.com mhickey@lewisrice.com

Attorneys for Defendants The Doe Run Resources Corporation, Marvin K. Kaiser, Albert Bruce Neil, Jeffrey L. Zelms, and Theodore P. Fox, III, Jerry Pyatt

DOWD BENNETT LLP

Edward L. Dowd, Jr. (#28785MO) 7733 Forsyth Blvd., Suite 1900 St. Louis, Missouri 63105 (314) 889-7300 edowd@dowdbennett.com

Attorneys for Defendants The Renco Group, Inc., D.R. Acquisition Corp., Ira L. Rennert, Renco Holdings, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

/s/ Geoffrey M. Drake Geoffrey M. Drake